

# EXHIBIT I

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

PARNELL COLVIN,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO.:
	)	2:20-cv-01765-APG-EJY
M.J. DEAN CONSTRUCTION,	)	
INC.,	)	
	)	
Defendant.	)	
	)	

VIDEO CONFERENCE DEPOSITION OF PAUL ROSEQUIST  
LAS VEGAS, NEVADA  
FRIDAY, AUGUST 6, 2021

**CERTIFIED  
TRANSCRIPT**

REPORTED BY: JACKIE JENNELLE, RPR, CCR #809  
JOB #416567

1           **Q.    Tell me about your investigation.**

2                   MR. ROSENTHAL:  Objection, overbroad, vague  
3           and ambiguous.

4           BY MR. MARKS:

5           **Q.    Tell me what you did to investigate the**  
6           **allegations contained in Exhibit 6.**

7           A.    I -- when it first started, as I've stated  
8           prior, is I had Parnell Colvin fill out his report.  
9           I submitted that report.

10                   I asked him if there was any other  
11           witnesses or anyone else he would like for me to  
12           interview, and he told me he wanted me to interview  
13           Ricky Flores, which is one of the foremen on the MSG  
14           Sphere project.

15                   I then contacted Kevin Gutierrez to take  
16           his testimony, his incident investigation, his  
17           statement.  I called him on the phone, asked him to  
18           come to my office.

19                   When he got to my office, I gave him some  
20           general information on what was happening at the  
21           time and I had him fill out a statement like I did  
22           with Mr. Colvin.

23           **Q.    Okay.  Did Mr. Gutierrez deny using the**  
24           **N-word?**

25           A.    Yes.

1 Q. And --

2 A. Adamantly denied that.

3 Q. Did Mr. Flores hear anything about the  
4 N-word on the job?

5 A. Not that he has ever told me about.

6 Q. Okay. So after that, did anything else  
7 ever happen regarding your investigation?

8 A. Yes.

9 Q. What did you do?

10 A. I then called Ricky Flores, had him come to  
11 my office, gave him the same basic rundown, had him  
12 fill out the forms in the same manner as previously  
13 and then I submitted his.

14 I then called in Dave McGrandy (phonetic)  
15 who was the area superintendent for Area D which  
16 Colvin was a part of. And I had him also fill out a  
17 witness statement.

18 Then when I got all the witness statements  
19 and after I had reviewed them, I called John  
20 Thomason and went over these with John Thomason and  
21 sought his counsel from that point forward.

22 Q. What did John Thomason say?

23 A. I wouldn't want to misquote Mr. Thomason.  
24 He spoke about the possibilities of moving somebody  
25 around to make this work for everybody.

## CERTIFICATE OF REPORTER

STATE OF NEVADA )  
 ) SS:  
COUNTY OF CLARK )

I, Jackie Jennelle, RPR, CCR #809, Clark County, State of Nevada, do hereby certify: That I reported the video conference deposition of PAUL ROSEQUIST, commencing on FRIDAY, AUGUST 6, 2021, at 10:00 a.m.

That prior to being deposed, the witness was duly sworn by me to testify to the truth. That I thereafter transcribed my said shorthand notes into typewriting and that the typewritten transcript is a complete, true and accurate transcription of my said shorthand notes.

I further certify that I am not a relative or employee of counsel, of any of the parties, nor a relative or employee of the parties involved in said action, nor a person financially interested in the action.

IN WITNESS WHEREOF, I have set my hand in my office in the County of Clark, State of Nevada, this 19th day of August, 2021.



JACKIE JENNELLE, RPR, CCR #809